

1 PAUL J. PASCUZZI, SBN 148810  
2 FELDERSTEIN FITZGERALD  
3 WILLOUGHBY PASCUZZI & RIOS LLP  
4 500 Capitol Mall, Suite 2250  
5 Sacramento, CA 95814  
6 Telephone: (916) 329-7400  
7 Fax: (916) 329-7435  
8 [ppascuzzi@ffwplaw.com](mailto:ppascuzzi@ffwplaw.com)

9  
10 Attorneys for The McClatchy Company,  
11 The News & Observer, The Charlotte  
12 Observer, The Herald, and The State  
13

14 UNITED STATES BANKRUPTCY COURT

15 DISTRICT OF DELAWARE

16 In re:

17 EARTH FARE, INC.,

18 Debtor.

19 Bankruptcy Case  
20 No. 20-10256 (KBO)

21 Chapter 11

22 **REQUEST FOR SERVICE OF DOCUMENTS**

23 PLEASE TAKE NOTICE that Paul J. Pascuzzi of Felderstein Fitzgerald Willoughby  
24 Pascuzzi & Rios LLP represents The McClatchy Company, The News & Observer, a division of  
25 The News and Observer Publishing Company, The Charlotte Observer, a division of Charlotte  
26 Observer Publishing Company, The Herald, a division of East Coast Newspapers, Inc., and The  
27 State, a division of The State Media Company, creditors and parties in interest in the above-  
28 captioned matter (collectively, "McClatchy"). The undersigned, pursuant to Section 1109(b) of  
Title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal  
Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), requests copies of all notices and  
pleadings pursuant to Bankruptcy Rule 2002(a). The undersigned requests that all such notices be  
addressed as follows:

29 Paul J. Pascuzzi  
30 Felderstein Fitzgerald Willoughby  
31 Pascuzzi & Rios LLP  
32 500 Capitol Mall, Suite 2250  
33 Sacramento, CA 95814  
34 [ppascuzzi@ffwplaw.com](mailto:ppascuzzi@ffwplaw.com)

1 PLEASE TAKE FURTHER NOTICE that, pursuant to Sections 342 and 1109(b) of the  
2 Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in  
3 the rules specified above but also includes any notice, application, complaint, demand, motion,  
4 petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted  
5 or conveyed by mail, electronic mail, hand or personal delivery, telephone, telegraph, telex, or  
6 otherwise filed or made with regard to this matter.

7 PLEASE TAKE FURTHER NOTICE that neither this Request for Service of Documents  
8 nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to be a  
9 waiver of McClatchy's (i) rights to have final orders in non-core matters entered only after de  
10 novo review by a higher court; (ii) right to trial by jury in any proceedings so triable herein or in  
11 any case, controversy, or proceeding related thereto; (iii) right to have the reference withdrawn in  
12 any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions,  
13 defenses, setoffs, or recoupments to which these creditors are or may be entitled under  
14 agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and  
15 recoupments are expressly reserved.

16 Dated: March 6, 2020

17 FELDERSTEIN FITZGERALD  
18 WILLOUGHBY PASCUZZI & RIOS LLP

19 By:s/ Paul J. Pascuzzi  
Paul J. Pascuzzi

20 Attorneys for The McClatchy Company,  
21 The News & Observer, The Charlotte  
Observer, The Herald, and The State

22

23

24

25

26

27

28

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2020, I electronically filed the foregoing REQUEST FOR SERVICE OF DOCUMENTS with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Karen L. Widder  
Karen L. Widder